SABIN METAL CORPORATION

1647 WHEATLAND CENTER ROAD • SCOTTSVILLE, NEW YORK 14546

REFINERS OF PRECIOUS METALS
GOLD · SILVER · PLATINUM · PALLADIUM · RHODIUM

(585) 538- 2194
FAX# 585-538-2593

January 27, 2016

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Re: Annual Report 2015

To Whom It May Concern:

Enclosed please find a report that contains the information required by 40 CFR 262.56 and 262.87(a).

I believe that you have all of the information you require. However, if you have any questions over this submission, do not hesitate to contact me.

Sincerely,

Michael S. Hubbard, MS, CIH
Senior Environmental Engineer

Enc.

Sabin Metal Corp.
January 27, 2016

EPA Annual Report for Exported Hazardous Waste – Calendar Year 2015

Exporter:

Sabin Metal Corporation — EPA ID# NYD-067919340
1647 Wheatland Center Rd.
Scottsville — NY 14546-0905

Consignee:

SMC (Canada), Ltd.
McAlpine Site/ Coleman Township
Cobalt — ON P0J 1C0

Transporter:

Peter Hodge Transportation, Ltd.
100 Market Drive
Milton — ON L9T 3H5

Hazardous Waste Export Description:

Common Description: Bricks and other refractory materials removed from ductwork, stacks and a thermal reduction furnace as a result of infrequent maintenance activities.

Hazardous Waste Numbers: D006, D007, D008

DOT hazard class: Environmentally Hazard Substance, Solid, n.o.s., (Lead)(Cadmium)(Chromium), 9, UN3077, PG III

Quantities Shipped:

Weight Shipped: 196,157 lb

Number of Shipments: three (3)

Comparison of Changes in Annual Volumes of Waste:

Sabin does not have a hazardous waste stream that is generated and shipped continuously.

Year	Waste	Quantity
2003	Silver/mercury batteries for mercury reclamation – silver residue returned	4191 lb
2004	NA	NA
2005	Waste water – accidentally mixed waste water with plating bath residues	10,050 lb
2006	Recovered spent plating bath solutions – evaporation system down for repairs	120,112 lb
2007	Recovered spent plating bath solutions – evaporation system down for repairs	3232 lb
	Silver/mercury batteries for mercury reclamation – silver residue returned	2455 lb
	Bricks and other refractory materials from ductwork, stacks and furnaces	437,945 lb
2008	Bricks and other refractory materials from ductwork, stacks and furnaces	159,665 lb
2009	Silver/mercury batteries for mercury reclamation – silver residue returned	3000 lb
2010	NA	NA
2011	NA	NA
2012	Silver/mercury batteries for mercury reclamation – silver residue returned	13,916 lb
	Bricks and other refractory materials from ductwork, stacks and furnaces	343,385 lb
2013	Silver/mercury batteries for mercury reclamation – silver residue returned	14,773 lb
	Waste paint	875 lb
2014	Silver/mercury batteries for mercury reclamation – silver residue returned	20,272 lb
	Bricks and other refractory materials from ductwork, stacks and furnaces	166,401 lb
	Waste epoxy paint	25 lb
2015	Silver/mercury batteries for mercury reclamation – silver residue returned	6777 lb
	Bricks and other refractory materials from ductwork, stacks and furnaces	196,157 lb

Description of Efforts to Reduce Volume and Toxicity of Waste:

Education was provided to the operators of the water recovery process so as to prevent the mixing of listed waste residues with the non-hazardous waste water. That has not

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occurred since, so it could be said that Sabin's waste reduction effort (education) has resulted in 10,000 lbs less of hazardous waste being generated every year. The evaporation system was rebuilt in 2007, so Sabin will not be disposing of plating bath waste water, as it did in 2006 and early 2007, unless there is a problem with the evaporation system that cannot be foreseen. Re-installing the evaporation has, therefore, eliminated the production of 120,000 lb or more of hazardous waste per year.
The hazardous waste exported in 2007, 2008 and 2012 was brick from large thermal reduction furnaces and their associated stack and lined ductwork. For two systems, it was removed during maintenance activities that occur approximately every 15 to 20 years on that particular unit. The furnace system dismantled in 2012 will not be re-installed, so the generation of waste from it will never occur again. The source of the environmental hazard for furnace systems is the burning of customer electronic scrap materials and the evaporation of filtrates from plating bath solutions that contain gold. The only way to eliminate or reduce the hazard would be to not process customer materials containing lead and cadmium or to no longer accept their gold plating baths. That would entail reducing Sabin's business activity dramatically and would, therefore, be economically infeasible.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signature: _____ *Date:* 1/27/2016

Name: James A. Barrett *Title:* General Manager

SABIN METAL CORPORATION
1647 WHEATLAND CENTER ROAD
P.O. BOX 905
SCOTTSVILLE, NEW YORK 14546

7014 0150 0001 0831 0175

RETURN RECEIPT
REQUESTED

te **EPA Mail**

Enforcement and Compliance
Assurance
top: ARIEL RIOS NORTH

tment: 2254A

Certified

7014 0150 0001 0831 0175

PS

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